

CORRES. CONTROL
INCOMING LTR NO.

00388 RF 01

DUE DATE
ACTION



2001 JUN 11 A 11:40

Department of Energy

CORRESPONDENCE
CONTROL

ROCKY FLATS FIELD OFFICE
10808 HIGHWAY 93, UNIT A
GOLDEN, COLORADO 80403-8200

JUN 07 2001

01-DOE-01037

[illegible]

Mr. Steve Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Dear Mr. Gunderson:

Enclosed please find minor modification #7 to the final Building 776/777 Decommissioning Operations Plan (DOP). This minor modification is being submitted in accordance with Section 4.5.2 of the DOP and Paragraph 127 of the Rocky Flats Cleanup Agreement. The modification includes: 1) a change to the documentation requirements for administrative closure of container storage units, and 2) a revision to the requirements for remediation waste treatment, which makes these requirements consistent with minor modification #4 (approved 5/23/2000).

Thank you for your consideration in this matter. Please call me at (303) 966-5918 or Sandi MacLeod at (303) 966-3367 if you have any questions or need more information.

Sincerely,

Joseph A. Legare
Assistant Manager
for Environment and Infrastructure

COR. CONTROL	X	X
ADMN. RECORD	X	X
PATS/130		

Enclosure

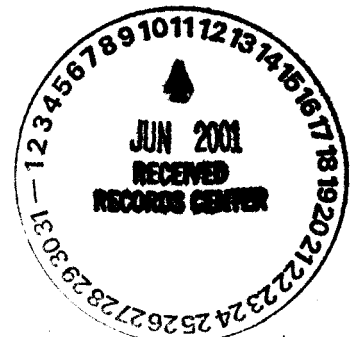
cc w/Enc:
E. Kray, CDPHE
J. Hindman, CDPHE
T. Rehder, EPA
M. Aguilar, EPA
S. MacLeod, FC, RFFO
G. Schuetz, FC, RFFO
R. DiSalvo, OCC, RFFO
Administrative Record

Reviewed for Addressee
Corres. Control RFP

Date 06/11/01 By lah

Ref Ltr. #

DOE ORDER # None

**ADMIN RECORD**

B776-A-000063

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

Mr. Steve Gunderson
01-DOE-01037

2

JUN 07 2001

cc w/o Enc:
D. Shelton, K-H
M. Ferri, K-H

Requested Changes to Building 776/777 DOP

Proposed changes to the DOP are identified by section and page number. Additions are shown in italics and deletions shown in strikeout. Changes are also shown with a sidebar marked "Mod #7".

- 1) Section 4.5.2, page 41: Please revise the first paragraph as shown. We would like to eliminate the requirement for submittal of a minor modification to the DOP for clean closure of container storage units by documenting the absence of contamination ("administrative closure") and replace it with a letter to the LRA seeking concurrence for the administrative closure. A minor modification for closure will still be required for tank systems, treatment units, and other types of container storage unit closures.

4.5.2 Closure Documentation

Prior to the decommissioning of each SET, RCRA unit-specific closure information will be submitted to the LRA for review and approval as a minor modification to this DOP under ¶127 of RFCA. The unit-specific information will include drawings and/or photographs of the RCRA-regulated unit or units in the SET, applicable EPA Waste Codes, the selected closure option(s), and closure requirements. *For clean closure of container storage units by documenting the absence of contamination in accordance with Section 4.5.1.1, a letter may be submitted to the LRA, in lieu of a minor modification to the DOP, detailing the results of the operating record review and visual inspection, and requesting concurrence that the unit has been closed.*

Mod
#7

Consistent with Section 1.1.4 of the DPP, portions of a RCRA-regulated unit may be removed prior to submittal of the required unit-specific closure information upon engagement of the consultative process and concurrence of the LRA. In such cases, LRA concurrence will be documented in an RFETS Regulatory Contact Record, which will be filed in the Project Record.

Mod
#2

A description of the closure activities completed for each RCRA-regulated unit will be included in the Final Closeout Report, which will be prepared for the Building 776/777 Closure Project upon completion of decommissioning activities. All RCRA units will be closed prior to building demolition.

- 2) Section 6.3, page 83: Please revise the last sentence as shown. We would like to add flexibility in determining when a minor modification to the DOP is required for remediation waste treatment, to make this section consistent with Ops Order OO-776-374.

6.3 Wastes Requiring Further Processing Prior to Off-Site Disposal

Most of the remediation waste generated during decommissioning will be the same or similar to routine waste for which there is a clear disposal path.

"REVIEWED FOR CLASSIFICATION"
By [Signature]
Date 6/4/01

However, as described below, certain LLM waste and TRU/TRM waste will require further processing prior to off-site shipment and disposal. At this time, the only treatment processes planned for Buildings 776/777 and/or 730 are processes identified in the RCRA Part B Permit and debris treatment, as described in Section 4.5.1.2. In the event additional treatment system(s) must be added to treat remediation waste in Building 776/777 or 730, ~~this information will be included in a minor modification to this DOP.~~ *they will be managed in accordance with Building 776/777 Operations Order OO-776-374, including, if applicable, submittal of a minor modification to this DOP. The LRA will be consulted when determining if a minor modification is necessary for remediation waste treatment, with the exception of generator treatment, as specified in the Operations Order.*

Mod
#7